

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MELISSA SINGH, individually and
on behalf of all others similarly
situated,

Plaintiff,

v.

EQUIFAX INFORMATION
SERVICES LLC,

Defendant.

Case No. _____

(Removal from the Superior
Court of Fulton County, Georgia)

DEFENDANT’S NOTICE OF REMOVAL

Defendant Equifax Information Services LLC (“Equifax”), by and through its undersigned counsel, hereby files this Notice of Removal of this action from the Superior Court of Fulton County, Georgia, wherein it is now pending as Case No. 25-CV-004182, to the United States District Court for the Northern District of Georgia. This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1331 and 1367. In support hereof, Equifax shows this Court as follows:

1. An action was filed on March 27, 2025 in the Superior Court of Fulton County, Georgia, entitled *Singh v. Equifax Information Services LLC*, Case No. 25-CV-004182 (the “State Court Action”).
2. Equifax executed a Waiver of Service of Summons on April 18, 2025.

3. This Notice is being timely filed with this Court within thirty (30) days after Equifax waived service of Plaintiff's initial pleading. *See Gipson v. Fountain*, No. 1:17-CV-3061-SCJ, 2017 WL 9882670, at *1-2 (N.D. Ga. Oct. 23, 2017).

4. This Court has original jurisdiction over this case pursuant to 28 U.S.C. § 1331, in that this is a civil action arising under the Constitution, laws or treaties of the United States, specifically, 15 U.S.C. § 1681 *et seq.*, otherwise known as the Fair Credit Reporting Act ("FCRA"), as follows:

- a. Plaintiff's Complaint, on its face, alleges that Equifax willfully and/or negligently violated the FCRA. *See* Compl. ¶¶ 28-32.
- b. The FCRA, pursuant to 15 U.S.C. § 1681p, provides that any action alleging a violation of its provisions "may be brought in any appropriate United States district court, without regard to the amount in controversy[.]"

5. Plaintiff also alleges an individual claim against Equifax for common-law negligence. *See* Compl. ¶¶ 33-38. She claims that Equifax owed her a duty of care, breached its duty by failing to exercise ordinary care when creating and distributing consumer reports about her and by failing to "properly address" her disputes, and caused her damages. *Id.*

6. Because this Court has original jurisdiction over Plaintiff's FCRA claims in this case, it also has supplemental jurisdiction over Plaintiff's common-

law negligence claim under Georgia law, because this claim is “so related” to Plaintiff’s FCRA claims that it “form[s] part of the same case or controversy under Article III of the United States Constitution.” 28 U.S.C. § 1367(a).

7. Pursuant to 28 U.S.C. § 1446(a), a true and correct copy of “all process, pleadings, and orders” on file in the State Court Action are attached hereto as **Exhibit A**.

8. Pursuant to 28 U.S.C. § 1446(d), a Notice to State Court of Removal is being concurrently filed with the Superior Court of Fulton County, Georgia, a copy of which is attached and marked as **Exhibit B**, and Equifax will give written notice to Plaintiff that this action has been removed to this Court.

9. As of the date of this removal, Equifax has not filed a responsive pleading in the State Court Action, and Equifax reserves all rights to assert any and all defenses with respect to the Complaint. Equifax further reserves the right to amend or supplement this Notice of Removal. By filing this Notice of Removal, Equifax does not waive any defense that may be available to it and expressly reserves all such defenses.

WHEREFORE, Equifax hereby gives notice that the matter entitled *Singh v. Equifax Information Services LLC*, pending in the Superior Court of Fulton County, Georgia, is removed to the United States District Court for the Northern District of

Georgia, and requests that the Court retain jurisdiction for all further proceedings in the matter.

Dated: May 12, 2025

/s/ Zachary A. McEntyre

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CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed a true and correct copy of the foregoing with the Clerk of the Court using the ECF system and sent a copy via U.S. mail and/or email to the following:

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This 12th day of May, 2025.

/s/ Zachary A. McEntyre
Zachary A. McEntyre